

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

IN RE:	)	CHAPTER 13 CASE NO. 21-11989
	)	
CYNTHIA L. EVANS	)	JUDGE ARTHUR I. HARRIS
	)	
Debtor	)	RESPONSE TO TRUSTEE'S
	)	OBJECTION TO CONFIRMATION
	)	

Now comes Debtor, CYNTHIA L. EVANS, by and through undersigned counsel and files this response to address the objections of the Trustee.

Debtor has completed and provided the business questionnaire to the Trustee. Debtor has also provided proof of homeowner's insurance for her real properties and her 2019 and 2020 federal tax returns. Further Debtor has shown that the rental income for the real property is sufficient to adequately maintain both her rental properties.

Debtor has also Amended Schedule A/B to include a claim against her former employer O.S.H.A. Debtor agrees that any funds received, which are not exempt, will be the property of the bankruptcy estate. And debtor has modified her plan to make provision in section 8.1 for the wrongful termination claim.

Debtor believes she has provided to the Trustee all that was requested of her and that the Trustee should remove her objection and allow her modified plan to be confirmed.

Respectfully submitted,

/s/ Paul A. Bayer  
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CERTIFICATE OF SERVICE

I certify that on August 12, 2021 a true and correct copy of the *Response to the Trustee's Objection* was served:

Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

Paul Bayer, on behalf of Paul Allen Bayer CO., LPA at [BayerLaw17@gmail.com](mailto:BayerLaw17@gmail.com)

Lauren Helbling, on behalf of the Chapter 13 Trustee's office at  
[Ch13trustee@ch13cleve.com](mailto:Ch13trustee@ch13cleve.com)

US Trustee's Office, at: [registereduser@doj.gov](mailto:registereduser@doj.gov)  
And by regular U.S. mail, postage prepaid, on:

Affirm, Inc.  
Attn: Bankruptcy  
Po Box 720  
San Francisco, CA 94104

Affirm, Inc.  
650 California St Fl 12  
San Francisco, CA 94108

Amex  
Correspondence/Bankruptcy  
Po Box 981540  
El Paso, TX 79998

Apprisen  
4500 East Broad Street  
Columbus, OH 43213

Avant/WebBank  
222 North Lasalle Street  
Suite 1600  
Chicago, IL 60601

Bank of America  
Attn: Bankruptcy  
Po Box 982234  
El Paso, TX 79998

Capital One  
Attn: Bankruptcy  
Po Box 30285  
Salt Lake City, UT 84130

Capital One  
Po Box 31293  
Salt Lake City, UT 84131

Capital One Auto Finance  
Credit Bureau Dispute  
Plano, TX 75025

Century Federal Cr Un  
1240 E 9th St  
Cleveland, OH 44199

Citizens Bank  
One Citizens Drive  
Ms: Rop 15b  
Riverside, RI 02915

City of Cleveland  
Division of Water  
P.O. Box 94540  
Cleveland, OH 44101

Comenity Bank/Overstock  
Attn: Bankruptcy  
Po Box 182125  
Columbus, OH 43218

Comenity Bank/Victoria Secret  
Attn: Bankruptcy  
Po Box 182125  
Columbus, OH 43218

Credit One Bank  
Attn: Bankruptcy Department  
Po Box 98873  
Las Vegas, NV 89193

Cuyahoga County Fiscal Office  
ATTN: BANKRUPTCY DEPT  
2079 East Ninth Street  
Cleveland, OH 44115

Discover Financial  
Attn: Bankruptcy  
Po Box 3025  
New Albany, OH 43054

DSRM Nat Bank/Valero  
Attn: Bankruptcy  
Po Box 696000  
San Antonio, TX 78260

Equiant/Thousand Trails  
Attn: Bankruptcy  
500 N Juniper Dr, Ste 100  
Chandler, AZ 85226

First Savings Bank  
Attn: Bankruptcy  
Po Box 5019  
Sioux Falls, SD 57117

Genesis FS Card Services  
Attn: Bankruptcy  
Po Box 4477  
Beaverton, OR 97076

Michael A. Kenny  
Courthouse Square  
310 W. Lakeside Road, Suite 300  
Cleveland, OH 44113

Navy Federal Credit Union  
Attn: Bankruptcy  
Po Box 3000  
Merrifield, VA 22119

Nordstrom Signature Visa  
Attn: Bankruptcy  
Po Box 6555  
Englewood, CO 80155

Ohio First Class Credit Union  
1800 Carnegie Avenue  
Cleveland, OH 44115

Paypal Credit  
PO Box 105658  
Atlanta, GA 30348

Selfinc/lead  
Attn: Bankruptcy  
515 Congress Avenue #2200  
Austin, TX 78701

Synco/car Care Coop T  
Attn: Bankruptcy  
Po Box 965060  
Orlando, FL 32896

Synchrony Bank  
Attn: Bankruptcy  
Po Box 965060  
Orlando, FL 32896

Synchrony Bank/Gap  
Attn: Bankruptcy  
Po Box 965060  
Orlando, FL 32896

Synchrony Bank/TJX  
Attn: Bankruptcy  
Po Box 965064  
Orlando, FL 32896

Synchrony/PayPal Credit  
Attn: Bankruptcy  
Po Box 965060  
Orlando, FL 32896

Telecom Self-reported  
Po Box 4500  
Allen, TX 75013

US Bank  
Attn: Bankruptcy

800 Nicollet Mall  
Minneapolis, MN 55402

Utility Self-reported  
Po Box 4500  
Allen, TX 75013

Wells Fargo Bank NA  
1 Home Campus Mac X2303-01a  
3rd Floor  
Des Moines, IA 50328

Woodforest National Bank  
Attn: Bankruptcy  
Po Box 7889  
The Woodlands, TX 77387

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